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Light & Wonder, Inc. and SG Gaming, Inc.
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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 EMPIRE TECHNOLOGICAL GROUP
LIMITED,

17 Plaintiff,
vs.

18 LIGHT & WONDER, INC., and
SG GAMING, INC.,

19 Defendants.

20 Case No. 2:22-cv-00923-MMD-BNW

21 **STIPULATION AND PROPOSED ORDER
TO EXTEND THE DEADLINE
GOVERNING THE LAST DAY TO FILE
SUMMARY JUDGMENT MOTION
REGARDING INITIAL PHASE OF
DISCOVERY**

22 **(THIRD REQUEST)**

23

LIGHT & WONDER, INC., and
SG GAMING, INC.,

24 Counter-Claimants,
vs.

25 EMPIRE TECHNOLOGICAL GROUP,
LIMITED,

26 Counter-Defendant.
27
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1 Plaintiff/Counter-Defendant Empire Technological Group Limited (“Plaintiff/Counter-
 2 Defendant”) and Defendants/Counter-Claimants Light & Wonder, Inc. and LNW Gaming, Inc.,
 3 formerly known as SG Gaming, Inc. (“Defendants/Counter-Claimants”) (together, the “Parties”),
 4 by and through their respective counsel of record, hereby respectfully submit this Stipulation and
 5 Proposed Order to extend the deadline governing the deadline to file Summary Judgment relating
 6 to the Initial Phase of Discovery in this case (“Summary Judgment Deadline”). Previously, the
 7 Court entered an Order extending all discovery deadlines in this matter thirty (30) days, including
 8 the Summary Judgment Deadline. The Court also entered an Order extending the deadline to file
 9 Summary Judgment seven (7) days. This is now the third request to extend the Summary Judgment
 10 Deadline and the Parties seek an additional seven (7) day extension. The Parties have agreed to
 11 such extension for the reasons set out below.

12 **COMPLETED DISCOVERY**

13 In the Discovery Plan and Scheduling Order (ECF No. 23), the Parties bifurcated discovery
 14 into two phases. During the Initial Phase of Discovery, which was limited to Light & Wonder’s I-
 15 Score Plus defense, the Parties completed six (6) depositions, sent multiple sets of discovery, and
 16 produced thousands of pages of documents. The Parties completed discovery on March 29, 2023.
 17 The existing Summary Judgment Deadline is April 19, 2023.

18 **GOOD CAUSE TO EXTEND DEADLINE**

19 The Parties were diligent in conducting the Initial Phase of Discovery in this matter and,
 20 as set forth above, vigorously sought and obtained discovery relating to the I-Score Plus
 21 defense. Good cause for the extension is primarily based on the fact that due to unforeseen
 22 circumstances, Mr. Yafeez Fatabhoy, one of Defendant’s primary attorneys, had his newborn son
 23 admitted into the hospital this past week. Mr. Fatabhoy participated in and guided much of
 24 Defendants’ discovery, and is an integral part of the Defendants’ legal team. The Parties have thus
 25 agreed to a seven (7) day extension to the Summary Judgment Deadline to accommodate these
 26 unforeseen circumstances.

27 The Parties have stipulated and agreed to extend the Summary Judgment Deadline by an
 28

1 additional seven (7) days as set forth below. This extension will ensure that the relevant
2 information and issues are reviewed and properly briefed for the Court to rule on any summary
3 judgment motions. For these reasons, this Stipulation is made for good cause and not for purposes
4 of delay.

5 The Parties hereby stipulate and agree to only extend the existing Summary Judgment
6 Deadline of April 19, 2023, seven (7) days to April 26, 2023. All other deadlines remain the same.

7 **IT IS SO AGREED AND STIPULATED:**

8 DATED this 18th day of April, 2023.

DATED this 18th day of April, 2023.

9 LEWIS ROCA ROTHGERBER
10 CHRISTIE LLP

DICKINSON WRIGHT PLLC

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22 Attorneys for Defendants/Counter-Plaintiffs
Light & Wonder, Inc. and SG Gaming, Inc.

23 **IT IS SO ORDERED:**

25 
26 BRENDAS WEKSLER
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: April 19, 2023